

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE: WORLD TRADE CENTER
DISASTER SITE LITIGATION
-----X

Docket No.: 21 MC 100 (AKH)

**RENEWED NOTICE OF
MOTION**

THIS DOCUMENT APPLIES TO ALL
WORLD TRADE CENTER DISASTER SITE
LITIGATION
-----X

PLEASE TAKE NOTICE THAT upon the Renewed Declaration of Brian D. Crosby dated March 29, 2011 and the exhibits annexed thereto, this Court's Order of March 24, 2011, and pursuant to Fed. R. Civ. P. 60 (b)(1) Plaintiffs' Liaison Counsel will request this Court to Order:

1. That the plaintiffs' cases on the attached Exhibit A are hereby reinstated to continue their litigation as opt-out plaintiffs; and
2. Such other and additional relief as this Court deems just and proper.

Dated: New York, New York
March 29, 2011

Respectfully submitted,

WORBY GRONER EDELMAN & NAPOLI BERN, LLP
Plaintiffs' Co-Liaison Counsel



Brian D. Crosby (BC-9543)

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To:

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WORBY GRONER EDELMAN & NAPOLI BERN, LLP

Attorneys for : Plaintiffs
350 5th Avenue, Ste. 7413
New York, New York 10118
(212) 267-3700

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The undersigned attorney hereby certifies, pursuant to Fed. R. Civ. P. 11 that I have read the within papers and that to the best of my knowledge and belief they are factually correct and meritorious.



Attorney name: Brian D. Crosby (BC9543)

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Service of a copy of the within
Dated, _____

is hereby admitted.

ATTORNEY(S) FOR

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PLEASE TAKE NOTICE:

☐ NOTICE OF ENTRY

that the within is a (certified) true copy of an _____ duly entered in the
office of the clerk of the within named court on _____ 200__.

☐ NOTICE OF SETTLEMENT

that an order _____ of which the within is a true copy, will be
presented for settlement to the HON. _____ one of the judges of the
within named Court, at _____ on _____ 200__ at _____ O'clock ____ M.

Dated, _____

Yours, etc.

WORBY GRONER EDELMAN & NAPOLI BERN LLP